

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DORMAN ANGEL, et al. : Case No. C-1-01 467
et al. : (BECKWITH, JUDGE)
Plaintiffs : (Magistrate Judge)
vs.

PACE LOCAL UNION 5-1967 : PACE LOCAL 5-1967
et al. : IDENTIFICATION OF WITNESSES
:
Defendants

The following witnesses and a synopsis of their testimony are identified by Defendant PACE Local 5-1967 as possible witnesses in trial of this action.

1. Tim Bray, who will testify as to the CBA's of 1990, 1993 and 1996; and as to requests of numerous members to secure severance pay from IP and as to the settlement of the dispute, complaints and grievances with IP; the negotiation of the EBP with IP, and the drafting of the EBP and completion thereof, and as to meetings with the membership and Executive Board meetings. He will also testify as to matters and issues raised in his deposition of November 29, 2004, including more detail on information he secured which led to the lawsuit by PACE Local 5-1967 against International Paper Co., in this Court.

2. Ken Stanifer, who will testify as to the CBA's of 1990, 1993 and 1996; and as to the negotiation of the EBP with IP, as to requests of numerous members to secure severance pay from IP and as to the dispute, complaints and settlement of grievances with IP; and the drafting of the EBP and completion thereof, and as to meetings with the membership and Executive Board meetings, and as

to discussions with, and instructions from, PACE IU Vice President Gerald Johnston that the EBP was not a collective bargaining agreement and that no membership vote was required under the PACE constitution.

3. Gerald Johnston, who will testify as to the CBA's of 1990, 1993 and 1996; and as to the negotiation of the EBP with IP, as to the effort to secure severance pay from IP and as to the dispute, complaints and settlement of grievances with IP; and as to discussions with Ken Stanifer, and instructions to him that the EBP was not a collective bargaining agreement and that no membership vote was required under the PACE constitution.

4. Tom Stewart, as to the negotiations for the EBP, and the drafting of the EBP and completion thereof.

5. Ronald Schweitzer, who will testify as to the CBA's of 1990, 1993 and 1996; and as to requests of numerous members to secure severance pay from IP and as to the settlement of the dispute, complaints and grievances with IP; the negotiation of the EBP with IP, and the drafting of the EBP and completion thereof, and as to meetings with the membership and Executive Board meetings.

Respectfully submitted,

/s/ Robert I. Doggett
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CERTIFICATE OF SERVICE

The undersigned certifies that he served copies of the above and attached documents upon Mark J. Byrne, attorney for Plaintiffs, 2300 Kroger Building, 1014 Vine Street, Cincinnati, Ohio 45202, upon Grant S. Cowan, Frost Brown Todd, LLC, 2200 PNC Tower, 201 East Fifth Street Cincinnati, Ohio 45202-4182, upon Vincent J. Miraglia, Esq. International Paper Company Legal Department, 6400 Poplar Avenue, Memphis, TN 38197; upon James B. Robinson, attorney for PACE International Union, 2520 Kroger Building, 1014 Vine Street, Cincinnati, Ohio 45202; upon Charles E. Groppe, Morgan, Lewis & Bockius, LLP, 1111 Pennsylvania Avenue, NW, Washington, D.C. 20004, and upon Robert J. Hollingsworth, Cors & Bassett, LCC, 537 East Pete Rose Way, Suite 400, Cincinnati, Ohio 45202, attorneys for defendant Smart Papers, LLC, by electronic service by the Clerk of Courts, this 30th day of November, 2004.

/s/Robert I. Doggett

Robert I. Doggett (0016849)
Trial Attorney for PACE Local 5-1967